

FREJKA PLLC
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Attorneys for Defendants

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,

Adv. Pro. No. 08-01789 (SMB)

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

SIPA LIQUIDATION

Defendant.

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L.
Madoff Investment Securities LLC,

Adv. Pro. No. 10-05419 (SMB)

Plaintiff,

v.

JAMES HELLER FAMILY, LLC, ESTATE OF JAMES
HELLER, BARBARA H. FRIETAG, as personal representative
and as an individual, STEVEN P. HELLER, as personal
representative and as an individual, HARRY H. FALK, as
personal representative, STEVEN P. HELLER REVOCABLE
TRUST, a Florida trust, ROBERT P. SALTSMAN, as trustee,
EVE FRIETAG, ELIZABETH FRIETAG DRANOFF, TRUST
FBO AN.D. [a minor] UNDER ARTICLES SIXTH AND
EIGHTH OF THE LAST WILL AND TESTAMENT OF JAMES
HELLER, a New York trust, BARBARA H. FRIETAG, as trustee,
TRUST FBO AL.D. [a minor] UNDER ARTICLES SIXTH AND
EIGHTH OF THE LAST WILL AND TESTAMENT OF JAMES
HELLER, a New York trust, BARBARA H. FRIETAG, as trustee,
TRUST FBO S.H. [a minor] UNDER ARTICLES SIXTH AND
EIGHTH OF THE LAST WILL AND TESTAMENT OF JAMES
HELLER, a New York trust, STEVEN P. HELLER, as trustee,
TRUST FBO KATHERINE HELLER UNDER ARTICLES
SIXTH AND EIGHTH OF THE LAST WILL AND

TESTAMENT OF JAMES HELLER, a New York trust, STEVEN P. HELLER, as trustee, KATHERINE HELLER, and ELEANOR LEACOCK,

Defendants.

NOTICE OF SUBSTITUTION OF COUNSEL AND ORDER

PLEASE TAKE NOTICE that the law firm of Frejka PLLC, 733 Third Avenue, New York, New York 10017, shall be substituted in place of the law firm of Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, New York 10036 as counsel of record for James Heller Family, LLC, Estate of James Heller, Barbara H. Freitag s/h/a Barbara H. Frietag, Steven P. Heller, Harry H. Falk, Steven P. Heller Revocable Trust, Robert P. Saltsman, Eve Freitag s/h/a Eve Frietag, Elizabeth Freitag Dranoff s/h/a Elizabeth Frietag Dranoff, Trust FBO AN.D. [a minor] under Articles Sixth and Eighth of the Last Will and Testament of James Heller, Trust FBO AL.D. [a minor] under Articles Sixth and Eighth of the Last Will and Testament of James Heller, Trust FBO S.H. [a minor] under Articles Sixth and Eighth of the Last Will and Testament of James Heller, Trust FBO Katherine Heller under Articles Sixth and Eighth of the Last Will and Testament of James Heller, Katherine Heller, and Eleanor Leacock (the "Defendants") in this adversary proceeding. All notices given or required to be given in this adversary proceeding shall be given to and served upon the following:

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PLEASE TAKE FURTHER NOTICE THAT the Defendants have knowledge of and consent to this substitution of counsel.

Dated: New York, New York

Dated: New York, New York

March 23, 2015

KRAMER LEVIN NAFTALIS &
FRANKEL LLP

By: /s/ Philip Bentley

Philip Bentley
1177 Avenue of the Americas
New York, New York 10036
Telephone: (212) 715-9100
Facsimile: (212) 715-8000

Dated: New York, New York
March 23rd, 2015

March 23, 2015

FREJKA PLLC

By: /s/ Elise S. Frejka

Elise S. Frejka
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SO ORDERED:

/s/ STUART M. BERNSTEIN
HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE